

3:22-mj-00027

DISTRICT OF OREGON, ss: AFFIDAVIT OF GRAHAM BOGUMILL

**Affidavit in Support of an Application
Under Rule 41 for a Search Warrant**

I, Graham Bogumill, being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, and have been since October 2019. My current assignment is to the Portland, Oregon Field Office. My training includes twenty-seven (27) weeks of Criminal Investigator and ATF Special Agent Basic Training at the Federal Law Enforcement Training Center in Glynco, Georgia. I have participated in investigations involving firearms trafficking, National Firearms Act violations, unlawful firearms possession, and the illegal narcotic trade, which often involves firearms. I have participated in investigations involving complex criminal organizations and gangs which often involve the illegal use and possession of firearms. I have participated in investigations where the use of computers, smart phones, digital media, and the internet have been used in furtherance of crimes related to the illegal possession / trafficking of firearms and illegal narcotics.

2. I submit this affidavit in support of a criminal complaint and arrest warrant for Tyler Ray Harnden with Date of Birth (DOB): XX/XX/1992 (hereinafter "**Harnden**"). As set forth below, there is probable cause to believe that **Harnden** was unlawfully in possession of a firearm and ammunition after having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of 18 U.S.C. § 922(g)(1).

Applicable Law

3. Title 18 U.S.C. § 922(g)(1) makes it unlawful for someone who has been convicted in any court of a crime punishable by imprisonment for a term exceeding one year to possess any firearm or ammunition which has been shipped or transported in interstate or foreign commerce.

Statement of Probable Cause

4. On February 14, 2022, I applied for and received federal search warrants for Tyler **Harnden** and his residence located at 280 Owens St. S. Salem, Oregon 97302. The search warrants were based upon probable cause that the defendant possessed evidence related to his distribution of counterfeit oxycontin pills manufactured with fentanyl and his illegal possession and manufacture of firearms. Agents learned that **Harnden** lived at 280 Owens St. S. Salem, Oregon 97302, along with his mother. **Harnden** lived in the basement of the premises and his mother lived on the first floor. The search warrants were authorized by the Honorable John Acosta, United States Magistrate Judge for the District of Oregon.

5. On February 16, 2022, at approximately 1:40 P.M., ATF Special Agents arrested **Harnden**, less than a mile away from his residence, and took him into custody for the aforementioned violations of federal law.

6. On February 16, 2022, after **Harnden** was arrested, ATF Special Agents and Salem Police Department Officers executed the search warrant at **Harnden's** residence located at 280 Owens St. S. Salem, Oregon 97302. During the search ATF found and seized the following items from the basement, where **Harnden** was living:

- A Glock, model 42, .380 caliber pistol with serial number AFZX899; and,

- A Canik, model TP9 SF, 9mm caliber pistol with serial number 20AT35004.

7. The Canik and Glock pistols were both located inside a safe in **Harnden's** bedroom. The safe was located next to **Harnden's** bed. **Harnden's** mother identified this room as her son's bedroom and the place where he lives. Inside the basement bedroom agents also discovered items of clothing indicating that this was **Harnden's** bedroom, as well as mail with **Harnden's** name on it and a package of firearm parts that was addressed to **Harnden**.

8. Inside the basement agents also discovered evidence that indicated that **Harnden** was manufacturing and selling firearms. Inside the basement agents found:

- Three (3) completed Privately Made Firearm (PMF) rifles, commonly referred to as "Ghost Guns";
- Thousands of rounds of various ammunition;
- Thirteen (13) lower receivers for rifles in various stages of completion;
- Two (2) pistol frames;
- Approximately 15 high-capacity magazines for various calibers of ammunition, some of which were already loaded;
- Three (3) drill presses and an assortment of firearm manufacturing equipment; and,
- Approximately 200 counterfeit blue M30 oxycontin pills, believed to be manufactured with fentanyl, and a small quantity of suspected heroin.

Several pictures displaying items seized from the residence are pictured below.

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9. On February 17, 2022, I consulted with an ATF Interstate Nexus expert about the Canik and Glock pistols recovered from **Harnden's** bedroom. The Nexus expert informed me

that the recovered firearms, the Glock, model 42 and Canik, model TP9, were not manufactured in the state of Oregon, and thus had traveled in interstate and/or foreign commerce prior to arriving here.

10. I have looked at some of the thousands of rounds of ammunition that were seized from the basement where **Harnden** was living and observed multiple boxes of various different brands of ammunition to include Federal, Remington, PMC, Winchester, and Red Army Standard ammunition. I know, for example, PMC ammunition not manufactured in the state of Oregon and the Red Army Standard boxes are stamped “made in Russia.” A picture of some of the ammunition is below:



11. I also know that **Harnden**, based upon reviewing his computerized criminal history, was convicted in 2015 of the felony crime of Unlawful Delivery of Heroin, in Marion County, Oregon, Circuit Court Case Number 15CR07787, and that he received a sentence of 24 months' imprisonment.


Conclusion

12. Based on the foregoing, I have probable cause to believe, and I do believe, that **Harnden** is a felon who is unlawfully in possession of firearms and ammunition, in violation of 18 U.S.C. § 922(g)(1). I therefore request that the Court issue a criminal complaint and arrest warrant for Tyler Ray **Harnden**.

13. Prior to being submitted to the Court, this affidavit, the accompanying complaint, and the arrest warrant were all reviewed by Assistant United States Attorney (AUSA) Scott Kerin, and AUSA Kerin advised me that in his opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

By phone pursuant to Fed R. Crim. P. 4.1 (JVA)
Graham Bogumill
Special Agent, ATF

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at
5:08 p.m. on February 18, 2022.


HONORABLE JOHN V. ACOSTA
United States Magistrate Judge

JVA

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United States Magistrate Judge